

PROCUREMENT 101: HOW TO WRITE A MODERN SLAVERY STATEMENT

Marisol Bernal, LUPC’s Responsible Procurement Lead, shares her tips on writing a modern slavery statement.

Addressing modern slavery risks, as part of our wider responsible procurement strategy, is a topic of huge importance to LUPC. Section 54 of the Modern Slavery Act (MSA) requires commercial organisations, with an annual turnover of £36 million or more, to report each year on their efforts to identify, prevent and mitigate modern slavery in their supply chains. The majority of LUPC members and suppliers should comply. It is not too late to write and publish a modern slavery statement. If you already have one, you should review your statement and make the appropriate amendments before the next publication. It is best practice to publish the statement within 6 months of the end of the financial year.

Here are my top tips on writing a modern slavery statement:

Make sure your statement complies with the mandatory elements of the Modern Slavery Act, which are:

- *To be visible in a prominent place on the website;*
- *Refer to work carried out in the previous financial year,;*
- *Approved at the highest level of governance (Board of Directors or equivalent management body), include date of approval; and*
- *Signed by someone at the most senior level (Director or equivalent).*
- *Report annually and about your past financial year, make it clear which financial year you are reporting on and keep your old statements online.*

The content of your statement should refer to the following areas:

- *The organisation’s structure, business and supply chains; provide relevant information that creates a picture of the structure of your business and your supply chains.*
- *Policies in relation to modern slavery and human trafficking; provide a link between your existing policies and modern slavery.*
- *Due diligence processes, risk assessment and management; identify high risks suppliers in your supply chains, this will help you to prioritise actions. Make sure you engage with suppliers and be clear about your expectations from them.*
- *Training on modern slavery and human trafficking; provide modern slavery training to all employees targeted in relation to each department e.g. human resources, procurement, legal, etc.*
- *Goals and Key Performance Indicators (KPIs) to measure the effectiveness of the organisation’s actions and progress over time; ensure you have KPIs related to modern slavery and track your short, medium and long term progress. Review goals and KPIs annually.*

You can use this Modern slavery statement check list to track your progress on writing your statement.

Mandatory (formal) requirements	Yes/No
Does the statement refer to work carried out in the previous financial year?	
Is it visible in a prominent place on the organisation’s website (home page or obvious drop-down menu)?	
Is it approved at the highest level of governance (Board of Directors or equivalent management body), include date of approval?	
Is it signed by someone at the most senior level (Director or equivalent)?	

Non mandatory and substantive Content	Yes/No
Has the statement been published within 6 months of the end of the most recent financial year?	
Does it provide relevant information that creates a picture of the structure of the business and its supply chains?	
Does it have policies with clear relation to modern slavery and human trafficking?	
Does it identify and recognise what specific risks exist in their supply chains?	
Does it explain the steps taken to prioritise and address higher risks, including engaging with suppliers on this matter?	
Does it provides modern slavery and human trafficking training to key staff such as human resources, procurement, legal, etc.	
Does it contain clear actions for the coming years to identify and mitigate risks, engage and collaborate with suppliers and other organisations?	